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M. Susan Savage MAYOR

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OFFICE OF THE MAYOR

200 CIVIC CENTER

TULSA, OKLAHOMA

74103

April 12, 2001

EX PARTE OR LATE FILED.

Michael K. Powell, Chairman Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: WT Docket No. 00-32

Dear Chairman Powell:

On behalf of the City of Tulsa, I would like to express our concern about the Federal Communication Commission's intention to auction 50 MHz of spectrum in the 4940-4990 MHz (4.9 GHz) band rather than allocating this critically needed spectrum to public safety for new broadband public safety applications.

The city of Tulsa is home to almost 400,000 citizens, but over 750,000 are served by our Public Safety Communications systems. Tulsa has always been and continues to be a leader in implementing technology for the benefit of providing the best public safety response to any given situation. The Tulsa Police Department has over eight hundred sworn officers and the Tulsa Fire Department has six hundred sworn firefighters. Both departments and other agencies take advantage of current technologies to perform their jobs and save lives. The City of Tulsa has come to rely on new technologies to provide the best protection possible for its citizens and those of surrounding communities.

In 1996 the Public Safety Wireless Advisory Committee was formed to advise Congress on the need for future frequency spectrum for the public safety community. As a result, this committee in cooperation with the public safety community recommended that an additional 95 MHz of spectrum be set aside to meet our communications needs over the next ten years. Of this amount, the greatest need will be advanced wideband and broadband technologies. To date, the FCC has allocated 24 MHz to public safety users in the new 746 MHz band. However, there are new emerging broadband technologies and applications appearing on the horizon that will require significantly wider bandwidths.

Broadband applications could provide solutions such as personal and vehicular area networks to wirelessly integrate a variety of existing and future devices to provide a safer environment for our officers. These include image and video cameras and viewers, mobile data terminals and all their peripheral devices, palmtops and wireless long range headsets, microphones, earpieces and voice recognition to allow complete hands free operation. Large data and image files can be No. of Copies rec'd

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rapidly and wirelessly transferred within Wireless Local Area Networks (WLAN), enabling images/fingerprints of wanted or missing persons, video clips of robberies, maps and layouts to be downloaded into police vehicle mobile computers as they leave the precinct. This same technology will also allow wireless uploads of videos, images and reports from the police vehicle to an incident command center. WLAN technology will also enable command centers to employ full motion video for remote controlled robotics in terrorist and other highly dangerous operations and monitoring of officers or suspects in officer assistance and high risk situations to allow on scene decision making and assistance based on video transactions.

Additionally, broadband fire solutions could include applications such as personal area networks (PAN) that can wirelessly integrate a variety of lifesaving tools into the firefighter's suit and helmet. To include biometric and environmental sensors, 3D location, video and thermal imaging cameras, wireless microphones and earpieces, and voice recognition to allow complete hands-free and wire-free operation of all communications. High speed wireless data links transmit this vital information to fire ground incident command centers, allowing them to constantly monitor the location and vital signs of all firefighters and help them navigate through smoke-filled burning buildings. These technologies could provide a critical link for quickly locating disoriented or downed firefighters before fatal injuries are sustained. Again, WLAN technology would enable graphics such as maps, images and building blueprints to be downloaded into fire vehicle mobile computers as they leave the firehouse. WLAN technology would also enable fire ground command centers to employ full motion video for remote controlled robotics in intense fires, hazardous material and bomb disposal and dangerous search and rescue operations. This technology would allow real time transmission of video and imagery from aircraft to fire ground commanders and for police surveillance.

Although unlicensed consumer oriented broadband technologies are on the horizon in the nearby 5 GHz band, public safety agencies cannot rely on unlicensed spectrum for our mission critical applications. We must have dedicated spectrum and systems that assure the safety of our personnel via immediate priority access, uninterrupted transmissions and guaranteed coverage and reliability. The proximity of this unlicensed band to the proposed public safety 4.9 GHz allocation allows us to leverage such standards based broadband technologies and yet have the dedicated, reliable, secure and enhanced featured broadband solutions that we require for our mission critical applications.

The City of Tulsa strongly urges you and the Commission to recognize our broadband spectrum needs and allocate this much needed 4.9 GHz band to the public safety community. Obtaining this spectrum is a critical step for public safety agencies such as ours to access these new advanced broadband solutions for our mission critical applications.

Sincerely,

M. Susan Savage Mayor

cc: Ms. Magalie Roman Sallas, Office of the Secretary